

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

TWIN FLAMES UNIVERSE.COM, INC., et al,
Plaintiffs,

-vs-

Case No. 2:20-cv-11659

Hon. Gershwin A. Drain

ARCELIA FRANCIS HUGUES, et al,
Defendants.

MOTION FOR SECOND ORDER EXTENDING TIME FOR DEFENDANT
ARCELIA FRANCIS HUGUES TO ANSWER OR OTHERWISE RESPOND TO
PLAINTIFFS' COMPLAINT¹

Defendant *pro se*, Arcelia Frances Hugues (“Ms. Hugues”), hereby moves for an extension of time until September 16, 2020, to file her answer or otherwise respond to Plaintiffs’ Complaint [Doc. No. 1] (the “Motion”). In support of the Motion, Ms. Hugues relies on Fed. R. Civ. Pro. 6(b) and states:

1. Ms. Hugues is a *pro se* litigant who lives in the state of New York. Ms.

Hugues has been receiving limited assistance from the Federal Pro Se Legal

¹ NOTICE OF LIMITED SCOPE ASSISTANCE: This document was drafted or partially drafted with the assistance of a lawyer licensed to practice in the State of Michigan, pursuant to MRPC 1.2(b). This document was prepared with the assistance of the Detroit Mercy Law Pro Se Legal Assistance Clinic, Theodore Levin U.S. Courthouse, Room 1044, 231 W. Lafayette Blvd., Detroit, MI 48226, Tel: 313-234-2690.

Assistance Clinic (the “Clinic”) in preparing her response to the Complaint. The Clinic operates part-time, three afternoons a week and provides assistance to qualified *pro se* litigants.

2. Plaintiffs had previously extended the time for Ms. Hugues to respond to the Complaint to September 11, 2020 and have now agreed to further extension. This Court previously entered an order extending the time for Ms. Hugues to answer or otherwise respond to Plaintiff’s Complaint on August 18, 2020 [Doc. No. 5].
3. On September 10, 2020, after determining that she needed additional time to prepare her response to the Complaint, Ms. Hugues contacted Plaintiffs’ counsel, via email, to request a brief, additional extension through and including Wednesday, September 16, 2020. See **Exhibit A**. Plaintiff’s counsel responded: “The extension is fine.” **Exhibit A**.
4. On September 11, 2020, Ms. Hugues informed the Clinic that Plaintiffs, through counsel, had agreed to the extension. **Exhibit A**. The Clinic prepared and sent a proposed stipulated order to Plaintiffs’ counsel on Friday afternoon, September 11, 2020, prior to the expiration of the time for Ms. Hugues to respond to the Complaint, memorializing the proposed extension.
5. When Plaintiffs’ counsel did not respond to the September 11, 2020 email, a follow up email on Saturday morning, September 12, 2020.

6. As of the time of the filing of the Motion, there has been no response from Plaintiff's counsel. However, **Exhibit A** establishes his assent to the brief extension sought by the Motion.
7. Given Ms. Hugues' timely, good faith efforts in obtaining the extension, and Plaintiffs' consent to it, there is good cause for the relief sought by the Motion pursuant to Fed. R. Civ. P. 6(b)(1)(A).

WHEREFORE, Defendant Arcelia Francis Hugues respectfully requests that this Court extend the time for her to answer or otherwise respond to Plaintiffs' Complaint [Doc. No. 1] through (and including) Wednesday, September 16, 2020.

Respectfully submitted,

/s/ Arcelia Francis Hugues (w/ perm)
By: Arcelia Francis Hugues, Defendant
Pro Se
7994 State Route 20
Madison, NY 13402
Telephone: (315) 404-9442
Email: archaicarcelia@zoho.com

Dated: September 14, 2020

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ARCELIA FRANCIS HUGUES, et al,
Defendants.

BRIEF IN SUPPORT OF MOTION FOR SECOND ORDER EXTENDING TIME
FOR DEFENDANT ARCELIA FRANCIS HUGUES TO ANSWER OR
OTHERWISE RESPOND TO PLAINTIFFS' COMPLAINT²

Defendant *pro se*, Arcelia Francis Hugues, hereby relies on Fed. R. Civ. Pro. 6(b) for her brief in support of this motion for an extension of time until September 16, 2020, to answer or otherwise respond to Plaintiffs' Complaint [Doc. No. 1].

Respectfully submitted,

/s/ Arcelia Francis Hugues (w/ perm)
By: Arcelia Francis Hugues, Defendant
Pro Se

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CERTIFICATE OF SERVICE

I hereby certify that the foregoing was filed via email to the Pro Se Administrator by the Pro Se Clinic with the Clerk of Court on September 14, 2020, and the parties of record will be served via the Court's electronic filing system when it is posted by the Clerk. Counsel of record, Matthew Kerry, was also served by email on September 14, 2020 at the address provided to the Court.

Respectfully submitted,
/s/Katie Warwick, 3L
For the Pro Se Clinic

EXHIBIT A

Re: Arcelia Francis Hugues Mini Extention

Arcelia Hugues <archaicarcelia@zoho.com>

Fri 9/11/2020 3:05 PM

To: Prose Clinic <proseclinic@udmercy.edu>

For your records, below is all the dialogue confirming the extension between Matthew Kerry and I. Thank you.

- Arcelia Francis Hugues

Sent using [Zoho Mail](#)

----- On Thu, 10 Sep 2020 11:35:40 -0400 **kerrylawpllc@gmail.com** wrote -----

That extension is fine. Thanks for the heads up on the website

On Wed, Sep 9, 2020 at 4:01 PM Arcelia Hugues <archaicarcelia@zoho.com> wrote:

Hello Matt,

This email is just to confirm our call a few minutes ago about getting a small extension till the 16th of September. Thank you all very much for giving me the extensions I needed to understand court process and whatnot as this is a new thing for me. Also, you may want to check out your website, when I went to your website to search for contact info it redirected me to a strange website that my computer warned contained viruses or something. I've attached a screenshot for you below.

Sincerely,

Arcelia Francis Hugues

Sent using [Zoho Mail](#)

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